## EXHIBIT 3

From: Ken Kim

**Sent:** Friday, October 16, 2020 6:33 PM

To: Barbara Bibas; Acacia Dietz

**Cc:** ESQ Edward ReBrook; iDS\_SINKS-02678 **Subject:** Re: Sines v Kessler - Discovery

You're very welcome, Acacia! Let us know if you should have any other questions.

Kenneth Kim Consultant, Discovery Services iDiscovery Solutions Mobile: 267.847.4876

Sent from a mobile device. Please excuse brevity and typos.

From: Acacia Dietz <acacia.dietz@outlook.com> Sent: Friday, October 16, 2020 6:30:33 PM

To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>

Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS\_SINKS-02678 <ids\_sinks-02678@idsinc.com>

**Subject:** RE: Sines v Kessler - Discovery

## [EXTERNAL SENDER]

Thank you for the clarifications Ken. I appreciate your communication and patience during this process.

Thank you,

ACACIA DIETZ Legal Assistant THE REBROOK LAW OFFICE

Phone: 586.696.0385

Email: acacia.dietz@outlook.com

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From: Ken Kim

Sent: Friday, October 16, 2020 6:29 PM

To: Acacia Dietz; Barbara Bibas

**Cc:** <u>ESQ Edward ReBrook</u>; <u>iDS SINKS-02678</u> **Subject:** RE: Sines v Kessler - Discovery

Hi Acacia:

Please see my responses in red below.

Regards, Ken

Kenneth Kim Consultant, Discovery Services iDiscovery Solutions Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>

**Sent:** Friday, October 16, 2020 6:25 PM

To: Ken Kim < kkim@idsinc.com>; Barbara Bibas < bbibas@idsinc.com>

Cc: ESQ Edward ReBrook < rebrooklaw@gmail.com >; iDS\_SINKS-02678 < ids\_sinks-02678@idsinc.com >

**Subject:** RE: Sines v Kessler - Discovery

## [EXTERNAL SENDER]

Ken-

Thank you – Just for verification, the "A0107 – A0133 (various emails recently collected – highlighted above in green) - produced on or about 8/26/2020 as production volume NSM003" – this was produced to the Plaintiff's for their review on or about 8-26-2020 – is this correct? This is correct

As for the items that iDS is unable to proceed on, I am looking into it, however, as of today we do not have any updated information to provide for those. Understood

Is there any update as to the forensic search of Mr. Colucci's devices? We are still performing 2<sup>nd</sup> level forensics investigation – we will provide you with report once completed.

Thank you

ACACIA DIETZ Legal Assistant THE REBROOK LAW OFFICE

Phone: 586.696.0385

Email: acacia.dietz@outlook.com

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From: Ken Kim

**Sent:** Friday, October 16, 2020 8:03 AM

To: Acacia Dietz; Barbara Bibas

**Cc:** <u>ESQ Edward ReBrook</u>; <u>iDS SINKS-02678</u> **Subject:** RE: Sines v Kessler - Discovery

Hi Acacia:

Please find below excerpt for the NSM collections from the recent status report that was sent out this week:

iDS EID	Defendant	Requested Device/Account	Account User Name if Multiple	Date Device/Account Made Available	Collection Status	iDS
	National					
	Socialist				Collection	
A0054	Movement	Bitchute	nsm88media2@protonmail.com	4/30/2019	Completed	Documents F
	National	BlogTalkRadio			iDS Cannot	iDS Cannot P
	Socialist	Podcast			Proceed	Further
TBD	Movement	Service	213-943-3765	7/7/2020	Further	Credentials r
	National	BlogTalkRadio			iDS Cannot	iDS Cannot P
	Socialist	Podcast			Proceed	Further - Pas
TBD	Movement	Service	516-453-6058	7/7/2020	Further	incorrect
	National					
	Socialist				Collection	
A0107	Movement	Email	nsm88atlanta@gmail.com	10/18/2019	Completed	Documents F
	National					
	Socialist				Collection	
A0108	Movement	Email	nsm88bama@gmail.com	10/18/2019	Completed	Documents F
	National					
40400	Socialist	F		40/40/2040	Collection	D
A0109	Movement	Email	nsm88cinci@gmail.com	10/18/2019	Completed	Documents F
	National				Calleation	
A0110	Socialist	F.m.a.il	none Consensation to Conseil cons	10/10/2010	Collection	Desuments
AUIIU		EIIIdii	nsmosconnecticut@gmail.com	10/18/2019	Completed	Documents
					Collection	
۸0111		Email	nsm88detroit@gmail.com	10/19/2010		Documents [
VOIII		LIIIdii	ismodetroit@gmail.com	10/10/2019	Completed	Documents
					Collection	
A0112		Email	nsm88kansas@gmail.com	10/18/2019		Documents F
7.0112		2		10, 10, 2015	Jompieced	3000711011031
					Collection	
A0113		Email	nsm88michigan@gmail.com	10/18/2019		Documents F
A0111 A0112 A0113	Movement National Socialist Movement National Socialist Movement National Socialist Movement National Socialist Movement	Email Email Email	nsm88connecticut@gmail.com  nsm88detroit@gmail.com  nsm88kansas@gmail.com  nsm88michigan@gmail.com	10/18/2019 10/18/2019 10/18/2019	Completed  Collection Completed  Collection Completed  Collection Completed	

	National					
	Socialist				Collection	
A0114	Movement	Email	nsm88monroe@gmail.com	10/18/2019	Completed	Documents F
	National					
	Socialist				Collection	
A0115	Movement	Email	nsm88ny@gmail.com	10/18/2019	Completed	Documents F
	National					
10116	Socialist	- ··	00.50	40/40/2040	Collection	
A0116	Movement	Email	nsm88r5@gmail.com	10/18/2019	Completed	Documents F
	National				Callastian	No do sumo sus
40117	Socialist	F	mana 00 and the florida Commail and	10/10/2010	Collection	No documen
A0117	Movement	Email	nsm88southflorida@gmail.com	10/18/2019	Completed	search terms
	National Socialist				Collection	No documen
A0118	Movement	Email	nsm88toledo@gmail.com	10/18/2019		search terms
AUIIS	National	EIIIdii	nsm88toledo@gmail.com	10/18/2019	Completed	search terms
	Socialist				Collection	No documen
A0119	Movement	Email	nsmalabama88@gmail.com	10/18/2019	Completed	search terms
AUIIJ	National	Liliali	<u>IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII</u>	10/18/2013	Completed	3earch terms
	Socialist				Collection	No documen
A0120	Movement	Email	nsmarkansas@gmail.com	10/18/2019	Completed	search terms
710120	National	Eman	<u>Homarkanoasegman.com</u>	10/10/2013	completed	Scarcii terriis
	Socialist				Collection	No documen
A0121	Movement	Email	nsmfresno@gmail.com	10/18/2019	Completed	search terms
	National					
	Socialist				Collection	No documen
A0122	Movement	Email	nsmmaryland@gmail.com	10/18/2019	Completed	search terms
	National			, ,	•	
	Socialist				Collection	
A0123	Movement	Email	nsmmsst88@gmail.com	10/18/2019	Completed	Documents F
	National					
	Socialist				Collection	
A0124	Movement	Email	nsmnc88@gmail.com	10/18/2019	Completed	Documents F
	National					
	Socialist				Collection	
A0125	Movement	Email	nsmpor@gmail.com	10/18/2019	Completed	Documents F
	National					
	Socialist				Collection	
A0126	Movement	Email	nsmregion4hq@gmail.com	7/7/2020	Completed	Documents F
	National					
	Socialist				Collection	
A0127	Movement	Email	nsmvermont@gmail.com	10/18/2019	Completed	Documents I
	National					
	Socialist				Collection	
A0128	Movement	Email	nsmwestvirginia@gmail.com	10/18/2019	Completed	Documents F

	National					
	Socialist				Collection	
A0129	Movement	Email	r3nsm88@gmail.com	10/18/2019	Completed	Documents F
						iDS Cannot P
	National				iDS Cannot	Further
	Socialist				Proceed	
TBD	Movement	Email	chiefofstaff@nsm88.org	7/7/2020	Further	Credentials r
100	Wioverneric	Lilian	cincrosaur (erismoo.org	77772020	T di tilei	iDS Cannot P
						Further
	National				iDS Cannot	Password no
	Socialist				Proceed	
TDD		F.a.a.il	common do a Caraca Caraca	7/7/2020		Defendant st
TBD	Movement	Email	commander@nsm88.org	7/7/2020	Further	account is In
	National				iDS Cannot	iDS Cannot P
	Socialist	<u>.</u> ,.		<b>-</b> /- /	Proceed	Further - Pas
TBD	Movement	Email	commanderburt@nsm88.org	7/7/2020	Further	incorrect
	National				iDS Cannot	iDS Cannot P
	Socialist				Proceed	Further - Pas
TBD	Movement	Email	Minnesota@gmail.com	10/18/2019	Further	incorrect
						iDS Cannot P
						Further
						Password no
	National				iDS Cannot	Defendant st
	Socialist				Proceed	account is
TBD	Movement	Email	nsm88ky@gmail.com	7/7/2020	Further	Inactive/Unk
	National				iDS Cannot	iDS Cannot P
	Socialist				Proceed	Further - Pas
TBD	Movement	Email	nsm88utah@gmail.com	10/18/2019	Further	incorrect
	National			, ,	iDS Cannot	iDS Cannot P
	Socialist				Proceed	Further - Pas
TBD	Movement	Email	nsm88utah@gmail.com	10/18/2019	Further	incorrect
100	Movement	Liliuli		10, 10, 2013	, artifer	iDS Cannot P
						Further - Pas
						correct but 2
					Collection	bypassed. A
	National					, ,
	National				pending -	made on 08/
	Socialist	F ''		40/40/2040	must	Defendant.
TBD	Movement	Email	nsm88wyoming@gmail.com	10/18/2019	bypass 2FA	collect again
	National				iDS Cannot	iDS Cannot P
	Socialist				Proceed	Further - Pas
TBD	Movement	Email	nsmambassador@gmail.com	7/7/2020	Further	incorrect
						iDS Cannot P
						Further
						Password no
	National				iDS Cannot	Defendant st
	Socialist				Proceed	account is
TBD	Movement	Email	nsmchiefofstagg@gmail.com	7/7/2020	Further	Inactive/Unk
TBD	Socialist	Email	nsmchiefofstagg@gmail.com	7/7/2020	Proceed	account is

						iDS Cannot P
	National				iDS Cannot	Further - Go
TDD	Socialist	F.m.a.il	namaalumbus ah Gamail aam	10/10/2010	Proceed	recognize th
TBD	Movement	Email	nsmcolumbus.oh@gmail.com	10/18/2019	Further	address.  iDS Cannot P
	National Socialist				iDS Cannot Proceed	Further - Pas
TBD	Movement	Email	nsmflorida@gmail.com	10/18/2019	Further	incorrect
100	Wioverneric	Lilian	пописе дишести	10/10/2013	Tartifei	iDS Cannot P
	National				iDS Cannot	Further - Go
	Socialist				Proceed	recognize th
TBD	Movement	Email	nsmorlando88@gmail.com	10/18/2019	Further	address.
						iDS Cannot P
						Further
					.000	Password no
	National Socialist				iDS Cannot	Defendant st
TBD	Socialist Movement	Email	nsmregion11@gmail.com	7/7/2020	Proceed Further	account is Inactive/Unk
טטו	National	LIIIaii	isini egioni i teginan.com	77772020	iDS Cannot	iDS Cannot P
	Socialist				Proceed	Further - Pas
TBD	Movement	Email	nsmregion9hq@gmail.com	10/18/2019	Further	incorrect
	National				iDS Cannot	iDS Cannot P
	Socialist				Proceed	Further - Pas
TBD	Movement	Email	nsmssdivision@gmail.com	7/7/2020	Further	incorrect
						iDS Cannot P
						Further
	National				iDS Cannot	Credentials r
TBD	Socialist Movement	Facebook		7/7/2020	Proceed Further	Defendant st account is In
טפו	Movement	racebook		7/7/2020	rurther	iDS Cannot P
						Further - hot
	National				iDS Cannot	something th
	Socialist	Hotline			Proceed	collected by
TBD	Movement	Service	651-659-6307	7/7/2020	Further	consultant
	National					
	Socialist		Colucci		Collection	
A0105	Movement	Laptop	Aspire 3 Model N17Q2	7/7/2020	Completed	Documents I
	National					No reviewab
40404	Socialist	Makila Davia	Colucci	7/7/2020	Collection	available fro
A0104	Movement	Mobile Device	iPhone 11 Pro Max	7/7/2020	Completed	data.
						iDS Cannot P Further
						Custodian st
	National				iDS Cannot	was returned
	Socialist		Colucci		Proceed	prior to the f
TBD	Movement	Mobile Device	iPhone XS Max	7/7/2020	Further	Court Order

		National				iDS Cannot	iDS Cannot P
		Socialist	Newsletter			Proceed	Further - Pas
ļ	TBD	Movement	Service	Benchmark	7/7/2020	Further	work
	TBD	National Socialist Movement	Newsletter Service	Constant Contact	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Credentials r Defendant st account is In
	TBD	National Socialist Movement	Twitter	NSM88	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Password no Defendant st never had ac
	TBD	National Socialist Movement	Twitter	@ColucciBurt	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Credentials r Custodian pr iDS should al access Twitte signing in usi device. iDS w in but based accesed on t device the To appears to b not been cor up. Hence, the for iDS to col
	TBD	National Socialist Movement	VKontakte (VK)	300604375	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Password no Defendant st account is In
	TBD	National Socialist Movement	VKontakte (VK)	Burt Colucci	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Password no Defendant st account is In
	TBD	National Socialist Movement	Website	www.nsm88.org	7/7/2020	Publicly available information was captured previously.	Documents I iDS EID A007 Defendant J. Defendant B he never had website.
	TBD	National Socialist Movement	Yahoo Groups Newsletter Service	nsmworld@yahoogroups.com	7/7/2020	iDS Cannot Proceed Further	iDS Cannot P Further Password no

						Defendant st account is In
					inc c	iDS Cannot P Further
	National				iDS Cannot	Password no
	Socialist				Proceed	Defendant st
TBD	Movement	YouTube	NSM Media	7/7/2020	Further	never had ac

You are correct in stating that everything that has been collected by iDS was subsequently produced and released to Plaintiffs as follows:

A0054 (Bitchute) – produced on or about 4/22/2020 as production volume NSM001 A0105 (Colucci Aspire 3 Model N17Q2) - produced on or about 7/14/2020 as production volume NSM002

A0107 – A0133 (various emails recently collected – highlighted above in green) - produced on or about 8/26/2020 as production volume NSM003

However, as you can see from the above status report excerpt, there are many social media and email accounts that iDS has not able to access for the various reasons provided.

Let us know if you have any questions.

Regards, Ken

Kenneth Kim Consultant, Discovery Services iDiscovery Solutions Mobile: 267.847.4876





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From: Acacia Dietz < <a href="mailto:acacia.dietz@outlook.com">acacia.dietz@outlook.com</a>>

**Sent:** Friday, October 16, 2020 2:08 AM

To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>

Cc: ESQ Edward ReBrook < <a href="mailto:rebrooklaw@gmail.com">rebrooklaw@gmail.com</a>>

**Subject:** Sines v Kessler - Discovery

## [EXTERNAL SENDER]

Ken & Barbara -

The Plaintiffs have stated in a new motion to the court that they are "unable to access the social media and email accounts that NSM has disclosed" -

To my knowledge, everything that has been collected by iDS is available to the Plaintiffs for their review, correct? If so, can you please give me the date that these were made available to the Plaintiffs for their review?

Thank you,

ACACIA DIETZ
Legal Assistant
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Email: <u>acacia.dietz@outlook.com</u>

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